

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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IN RE:

MANUEL VOLCAN aka  
MANUEL D. VOLCAN,

CHAPTER 7  
Case No. 1-11-42029-jbr

Debtor.

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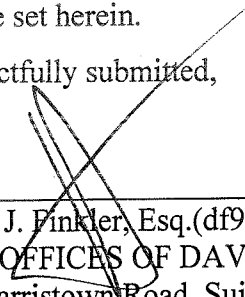
**MOTION TO REOPEN CLOSED BANKRUPTCY CASE ON  
BEHALF OF CREDITOR WESTERN UNION FINANCIAL SERVICES, INC.**

Counselors:

PLEASE TAKE NOTICE, that Western Union Financial Services, Inc., a successor in interest to Vigo Remittance Corp., as a creditor of the Debtor, Manuel Volcan aka Manuel D. Volcan, hereby moves this Court on the 6<sup>th</sup> day of February, 2012, at 10:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, Eastern District of New York, located at 271 Cadman Plaza East, Brooklyn, New York, for an Order pursuant to 11 U.S.C. section 350(b) and Bankruptcy Rule 5010, to reopen this closed bankruptcy case in order to file an adversary complaint pursuant to 11 U.S.C. 523(a)(3) that the debt owed to Western Union was not discharged, along with such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to local Bankruptcy Rule 9006-1 all answering affidavits and briefs, if any, must be served and received by counsel to the creditor at least seven (7) days prior to the hearing date set herein.

Respectfully submitted,

  
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